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12 *Attorneys for Defendant/Cross-Defendant*  
13 *Anilox Roll Company, Inc. d/b/a*  
14 *ARC International, Inc.*

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 CHARLIE RESOSO,  
18 Plaintiff,

19 v.

20 CLAUSING INDUSTRIAL, INC., ANILOX  
21 ROLL COMPANY WEST, INC. d/b/a ARC  
22 INTERNATIONAL; ANILOX ROLL  
23 COMPANY, INC. d/b/a ARC  
24 INTERNATIONAL, inclusive,

25 Defendants.

26 CLAUSING INDUSTRIAL, INC.

27 Cross-Claimant,

28 v.

29 ANILOX ROLL COMPANY, INC.

30 Cross-Defendant.

CASE NO.: 2:14-cv-00102-RFB-GWF

**STIPULATION AND PROPOSED ORDER**  
**TO AMEND DISCOVERY PLAN**  
(Second Request)

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1                    **STIPULATION AND PROPOSED ORDER TO AMEND DISCOVERY PLAN**

2            IT IS HEREBY STIPULATED by and between Plaintiff CHARLIE RESOSO  
3 ("PLAINTIFF"), by and through his counsel of record, WILLIAM R. BRENSKE, ESQ. of the law  
4 firm of BRENSKE & ANDREEVSKI; Defendant/Cross-Defendant ANILOX ROLL COMPANY,  
5 INC. d/b/a ARC INTERNATIONAL ("ARC EAST"), by and through its counsel of record,  
6 GRIFFITH H. HAYES, ESQ. and KEIVAN A. ROEBUCK, ESQ. of the law firm of LITCHFIELD  
7 CAVO LLP; and Defendant CLAUSING INDUSTRIAL, INC. ("CLAUSING"), by and through its  
8 counsel of record, GEORGE D. YARON, ESQ. and KEITH E. PATTERSON, ESQ. of the law firm  
9 of YARON & ASSOCIATIES, to extend discovery deadlines for good cause shown. This Stipulation  
10 and Proposed Order is submitted pursuant to and in compliance with LR IA 6-1 and LR 26-4, as  
11 follows:

12            **1. Statement Specifying the Discovery Completed**

13            On September 28, 2017, ARC EAST filed its Motion for Summary Judgment ("MSJ"). On  
14 September 29, 2017, ARC EAST's Motion for Protective Order Regarding the FRCP 30(b)(6)  
15 Deposition of ARC EAST was heard by United States Magistrate Judge George W. Foley. ARC  
16 EAST's Motion for Protective Order was granted, and as such, ARC EAST agreed to make its FRCP  
17 30(b)(6) witnesses available at a time convenient for all parties. The Court also held in abeyance ARC  
18 EAST's disclosure of expert witnesses pending a further ruling by the Court on ARC EAST's MSJ.  
19 The Court further held that should the Court deny the MSJ, the parties will be given adequate time to  
20 designate/disclose expert witnesses, rebuttal witnesses and complete disclosure, as discussed in open  
21 court.

22            On December 14, 2017 and December 15, 2017, the FRCP 30(b)(6) deposition of ARC EAST  
23 was held. During that time, the parties learned that there are additional persons most knowledgeable  
24 of ARC EAST that will need to be deposed in order to complete the FRCP 30(b)(6) deposition of ARC  
25 EAST.

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27            ///

28            ///

1           **2. A Specific Description of the Discovery that Remains to be Completed**

2           The FRCP 30(b)(6) deposition must be completed, ARC EAST's MSJ must be fully briefed,  
3 and the parties need to designate/disclose expert witnesses, rebuttal witnesses, and complete  
4 disclosure.

5           **3. Reasons Why Discovery Is Not Completed**

6           Because of a family medical emergency concerning one of ARC EAST's FRCP 30(b)(6)  
7 deponents, ARC EAST needed to move the FRCP 30(b)(6) deposition to a later date, which was the  
8 basis of the parties' Stipulation and Order to Amend Discovery Plan (First Request). Now that the  
9 FRCP 30(b)(6) deposition has begun, it was discovered that additional persons most knowledgeable  
10 of ARC EAST need to be deposed in order to complete the FRCP 30(b)(6) deposition.

11           **4. Proposed Schedule for Completing All Remaining Discovery**

12           The parties request a brief extension as follows:

	<u>Current Dates</u>	<u>Proposed New Dates</u>
14 FRCP 30(b)(6) depositions of ARC EAST	December 14, 2017 December 15, 2017	January 22, 2018
16 Oppositions to ARC EAST's MSJ	January 19, 2018	February 23, 2018
17 ARC EAST's Reply in Support of MSJ	February 2, 2018	March 16, 2018
18 ARC EAST's Motion to Further Stay 19 Disclosure of Expert Witnesses	February 9, 2018	March 23, 2018
20 Discovery Cut Off Date	January 29, 2018	March 15, 2018
21 Dispositive Motions	March 1, 2018	April 13, 2018
22 Pretrial Order	April 2, 2018	May 11, 2018

23  
24           All other discovery terms stated in the parties' Discovery Plan and Scheduling Order filed  
25 October 17, 2017 remain unchanged.

26           Counsel will meet and confer regarding the sequence and timing of each person most  
27 knowledgeable for ARC EAST's FRCP 30(b)(6) deposition set to continue on January 22, 2018.  
28 Counsel will reach an agreement as to the aforementioned sequence and timing by January 5, 2018.

1 The undersigned respectively have the authority to execute this Stipulation and bind the  
2 respective parties hereto.

3  
4 DATED this 4th day of January, 2018.

5 **BRENSKE & ANDREEVSKI**

6 By: /s/ William R. Brenske  
7 WILLIAM R. BRENSKE, ESQ.  
8 3800 Howard Hughes Pkwy, Suite 500  
9 Las Vegas, Nevada 89169  
10 *Attorneys for Plaintiff Charlie Resoso*

DATED this 4th day of January, 2018.

**LITCHFIELD CAVO LLP**

By: /s/ Keivan A. Roebuck  
GRIFFITH H. HAYES, ESQ.  
KEIVAN A. ROEBUCK, ESQ.  
3993 Howard Hughes Pkwy, Suite 100  
Las Vegas, Nevada 89169  
*Attorneys for Defendant/Cross-Defendant Anilox  
Roll Company, Inc. d/b/a ARC International, Inc.*

11  
12 DATED this \_\_\_\_ day of December, 2017.

13 **YARON & ASSOCIATES**

14  
15 By: \_\_\_\_\_  
16 GEORGE D. YARON, ESQ.  
17 KEITH E. PATTERSON, ESQ.  
18 1300 Clay Street, Suite 800  
19 Oakland, CA 94612  
20 *Attorneys for Defendant/Cross-Claimant*  
21 *Clausing Industrial, Inc*

IT IS SO ORDERED.

22 DATED this 5th day of January, 2018

23   
24 UNITED STATES MAGISTRATE JUDGE

1 The undersigned respectively have the authority to execute this Stipulation and bind the  
2 respective parties hereto.

3  
4 DATED this \_\_\_\_ day of December, 2017.

5 **BRENSKE & ANDREEVSKI**

6 By: \_\_\_\_\_  
7 WILLIAM R. BRENSKE, ESQ.  
8 3800 Howard Hughes Pkwy, Suite 500  
9 Las Vegas, Nevada 89169  
10 *Attorneys for Plaintiff Charlie Resoso*

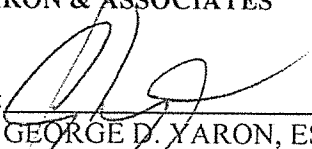
DATED this \_\_\_\_ day of December, 2017.

**LITCHFIELD CAVO LLP**

By: \_\_\_\_\_  
GRIFFITH H. HAYES, ESQ.  
KEIVAN A. ROEBUCK, ESQ.  
3993 Howard Hughes Parkway, Suite 100  
Las Vegas, Nevada 89169  
*Attorneys for Defendant/Cross-Defendant Anilox  
Roll Company, Inc. d/b/a ARC International, Inc.*

11  
12 DATED this 29 day of December, 2017.

13 **YARON & ASSOCIATES**

14  
15 By:  \_\_\_\_\_  
16 GEORGE D. YARON, ESQ.  
17 KEITH E. PATTERSON, ESQ.  
18 1300 Clay Street, Suite 800  
19 Oakland, CA 94612  
20 *Attorneys for Defendant/Cross-Claimant*  
21 *Clausing Industrial, Inc*

22  
23 IT IS SO ORDERED.

24 DATED this \_\_\_\_ day of \_\_\_\_\_, 2017

25  
26  
27  
28  
UNITED STATES MAGISTRATE JUDGE